



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 17, 2020

BY ECF

The Honorable Sidney H. Stein
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Anthony Young*, S1 19 Cr. 256 (SHS)

Dear Judge Stein:

The Government submits this letter in advance of the sentencing of Anthony Young a/k/a “Royalty” (“Young” or the “defendant”) in the above-referenced matter, in order to briefly respond to some of the statements made in the defendant’s September 10, 2020 sentencing submission (“Def. Subm.”) (ECF No. 30).

First, the defendant claimed in his submission that he has “taken responsibility for his actions by . . . cooperating with the Government.” Def. Subm. at 8. That is false. The defendant did not cooperate with the Government, nor did he offer or attempt to proffer or cooperate. To the contrary, as outlined in the Government’s January 23, 2020 sentencing submission, in his plea allocation the defendant minimized his conduct and disclaimed responsibility for manipulating two young girls into the commercial sex trade, all for the defendant’s financial benefit. During his plea allocation, the defendant only admitted to being a “cabbie” who chauffeured the victims—deliberately omitting any mention of his role as the recruiter and orchestrator of the conspiracy to which he pleaded guilty.

Second, in arguing for a sentence that will run concurrent to the state sentence the defendant is currently serving, the defendant stated in his submission: “The Government represented that the instant federal prosecution involved victims that were different to the state prosecution,” then listed the perceived similarities between Young’s federal and state convictions, all in support of his argument for a concurrent sentence. Def. Subm. at 12. To clarify, the defendant’s federal conviction encompasses the defendant’s victimization of two minor victims, one of whom was also a minor victim encompassed by the defendant’s New York State conviction, albeit for a distinct time period than that charged in the instant case. Given that: (1) the defendant is charged in this case with having victimized a second minor victim—which conduct is not encompassed by the State case; (2) the defendant pleaded guilty, pursuant to a plea agreement, to a charge with no mandatory minimum term of imprisonment, without which the defendant would have faced a 10-year mandatory minimum sentence; and (3) the defendant failed to admit to the full extent of his role in the charged conspiracy, as discussed above and in the Government’s prior submission, a consecutive sentence is warranted.

¹ The defendant's medical records have been provided to defense counsel and may be provided to the Court, upon request.